

**IN THE  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

---

**UNITED STATES OF AMERICA,** )  
Plaintiff, )  
                        )  
v.                     )  
                        )  
**LASHONDA HALL**         )  
Defendant.             )

---

No. 3:07-cr-51-006  
Judge Thomas A. Varlan

**MOTION FOR LEAVE TO FILE BRIEF UNDER SEAL**

Defendant LASHONDA HALL by and through undersigned counsel MIANGEL CODY, respectfully requests that this Court enter an order sealing her filing entitled: "Defendant Lashonda Hall's Motion for A Sentence Reduction Pursuant to Sections 603 And 404(B) of the First Step Act." In support of this Motion for Leave to file under seal, the Defendant states the following:

1. Defendant Hall's First Step Act Motion contains sensitive and private information concerning certain acts of violence that have been committed against her. Such information is mitigation that is relevant to the Court's Section 3553(a) analysis and ruling on her substantive motion. The private information is, by its very nature, sensitive and generally kept in a confidential manner.

WHEREFORE, for the reasons stated above, the Defendant respectfully requests that this Court enter an order granting the Defendant leave to file the following motion under seal:

Defendant Lashonda Hall's Motion for A Sentence Reduction Pursuant to Sections 603 And 404(B) of the First Step Act.

Respectfully submitted,



/s/ MiAngel Cody  
MIANGEL CODY  
TDC LAW OFFICE  
1325 S. Wabash Ave., Ste 305  
Chicago, IL 60605  
Tel: 312-858-8333

*Counsel for LaShonda Hall*

### **CERTIFICATE OF SERVICE**

The undersigned, MiAngel Cody, an attorney with The Decarceration Collective hereby certifies that on December 16, 2021 I electronically filed the following with the Clerk of the Court using the CM/ECF system:

### **MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**



/s/ MiAngel Cody  
MIANGEL CODY  
TDC LAW OFFICE  
1325 S. Wabash Ave., Ste 305  
Chicago, IL 60605  
Tel: 312-858-8333

*Counsel for LaShonda Hall*